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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE NORTHERN ASSURANCE COMPANY
OF AMERICA and AMERICAN HOME
ASSURANCE COMPANY,

Plaintiffs,

- against -

LAFARGE NORTH AMERICA, INC. and
AMERICAN STEAMSHIP OWNERS
MUTUAL PROTECTION AND
INDEMNITY ASSOCIATION, INC.,

Defendants.

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Index No.:
08 CV 03289

**AFFIRMATION IN SUPPORT OF
MOTION FOR A SEVEN (7) DAY
EXTENSION OF TIME TO
ANSWER THE COMPLAINT**

John Eric Olson, an attorney duly admitted to practice before this Court, affirms
under penalty of perjury as follows:

1. I am an attorney at law and member of the firm of Hill Rivkins & Hayden
LLP, the attorneys for Lafarge North America Inc. (“LNA”), and in said capacity I am
fully familiar with the facts and circumstances of the instant action.

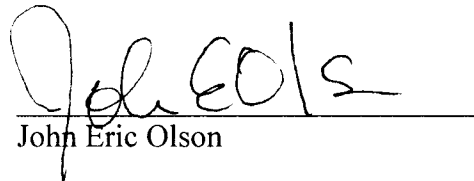
2. The Complaint in this action is a 107 Paragraph, complex Complaint raising
many issues relevant to other actions before the Court. *American Steamship Owners
Mutual Protection & Indemnity Assoc., Inc. v. Lafarge North America Inc.*, Index No. 06-

CV-3123 (CSH) and *New York Marine & General Insurance Co. v. Lafarge North America, Inc.*, Index No.; 05-CV-9612 (CSH).

3. My partner, Robert G. Clyne, who has the primary responsibility for this action has been traveling extensively over the past two weeks, being in Washington, Virginia, London, and is presently in Houston, Texas.

4. This affiant has requested a short extension of time by voicemail to plaintiff's counsel John A.V. Nicoletti, Esq. yesterday afternoon, April 22, 2008 and again this morning by voicemail, but as of the execution of this Affirmation we have not received a response from Mr. Nicoletti or his firm. Brief extensions of time to answer are routinely granted between maritime counsel, and I cannot recall in my career ever denying a defendant's request for additional time to answer a complaint.

5. It is respectfully submitted that a short extension of seven (7) days, will not lead to any of the delays or prejudice as alleged by counsel for the plaintiffs in its April 21, 2008 letter to the Court.


John Eric Olson

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